

20-0149

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|---|-------------|------------------------------------|
| IN RE: Edwell T. Henry, II | Debtor(s) | 20-10939 ELF |
| WELLS FARGO BANK, N.A. | Movant | Chapter 13 Proceeding |
| v. Edwell T. Henry, II and Kenneth E. West, Esquire | Respondents | Hearing Date: 01/04/2022 at 1:00pm |

CERTIFICATE OF NO RESPONSE
TO MOTION TO DIRECT THE DEBTOR TO RESOLVE THE DELINQUENCY IN
FORBEARANCE AND POST PETITION PAYMENTS

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the Motion filed on has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Hearing, objections to the Motion were to be filed and served no later than **12/14/2021**.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

Respectfully submitted,
POWERS KIRN, LLC

By: /s/ Harry B. Reese
By: Harry B. Reese
Attorney ID # 310501
Eight Neshaminy Interplex, Suite 215
Trevose, PA 19053
Telephone: 215-942-2090
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E-mail: bankruptcy@powerskirn.com
Attorney for Movant
DATED: December 15, 2021

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CERTIFICATION OF SERVICE AND NOTICE

HARRY B. REESE, counsel for WELLS FARGO BANK, N.A., hereby certifies that a copy of the foregoing Certificate of No Response was served upon the following persons by electronic notification or regular first-class mail, postage prepaid, on December 15, 2021:

Served Electronically:

Brenna Hope Mendelsohn, Esquire
637 Walnut Street
Reading, PA 19601
Attorney for Debtor(s)

Kenneth E. West, Esquire
1234 Market Street - Suite 1813
P.O. Box 40837
Philadelphia PA 19107
Trustee

Served Via 1st Class Mail:

Edwell T. Henry, II
706 B. Sedgefield Drive
Mt. Laurel NJ 08054
Debtor

POWERS KIRN, LLC

By: /s/ Harry B. Reese

By: Harry B. Reese

Attorney ID # 310501

Eight Neshaminy Interplex, Suite 215

Trevose, PA 19053

Telephone: 215-942-2090

Facsimile: 215-942-8661

E-mail: bankruptcy@powerskirm.com

Attorney for Movant

DATED: December 15, 2021